

Federal Defenders OF NEW YORK, INC.

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David E. Patton
Executive Director
and Attorney-in-Chief

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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 14, 2025

By ECF

The Honorable Analisa Torres
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Allen Lawrence, 20 Cr. 272 (AT)

Dear Judge Torres:

I write with the consent of the Government to respectfully request:

1. Mr. Lawrence be permitted to travel to New Bern, North Carolina from February 19 to 24, 2025 to care for his father. Since his release in 2021, Mr. Lawrence has traveled regularly to see his father without incident. Probation did not approve because of the pending violation, but the Government consents. This trip is necessary because Mr. Lawrence's father is in his 90s, has dementia, and has a lot of needs. Mr. Lawrence is the leader of his father's care team and has power of attorney. He oversees his father's care, attend doctor appointments and manages his father's home and financial life, including paying bills and dealing with insurance matters. This trip is particularly important because he must prepare materials for his father's accountant before the end of this month. He plans his trip around his group and individual therapy, and he will not miss any meetings.
2. The Court adjust the sentencing submission dates to 2/24 for the defense and 3/1 for the Government. This will allow the defense needed time to prepare the letter and collect supporting documents.

Thank you for the Court's consideration of these requests.

GRANTED.

SO ORDERED.

Dated: February 18, 2025
New York, New York



ANALISA TORRES
United States District Judge